

1 Muriel B. Kaplan, Esq. (SBN 124607)
Michele R. Stafford, Esq. (SBN 172509)
2 Shaamini A. Babu, Esq. (SBN 230704)
SALTZMAN & JOHNSON LAW CORPORATION
3 120 Howard Street, Suite 520
San Francisco, CA 94105
4 (415) 882-7900
(415) 882-9287 – Facsimile
5 mkaplan@sjlawcorp.com
mstafford@sjlawcorp.com
6 sbabu@sjlawcorp.com

7 Attorneys for Plaintiffs

8
UNITED STATES DISTRICT COURT
9
FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 GIL CROSTHWAITE, et al., as Trustees of the
OPERATING ENGINEERS HEALTH AND
12 WELFARE TRUST FUND FOR NORTHERN
CALIFORNIA, et al.,
13

14 Plaintiffs,

15 v.

16 JOLANDCO, INC.,
17

17 Defendant.
18

Case No.: C08-1560 MHP

**REQUEST FOR ENTRY OF DEFAULT;
AND DECLARATION OF SHAAMINI A.
BABU IN SUPPORT THEREOF**

19 TO THE CLERK:
20

21 Please enter the default of Defendant JOLANDCO, INC. on the Complaint in the above-
22 entitled action. This request is based on the fact that Defendant has failed to plead or otherwise
23 defend or appear in this action, and the time permitted for such pleading, defense or other
24 appearance has run.

- 25 1. A Complaint was filed by Plaintiffs in this matter on March 21, 2008.
26 2. Defendant was served on March 25, 2008.
27 3. A Proof of Service on Summons was filed with the Court on March 31, 2008.
28

-1-
REQUEST FOR ENTRY OF DEFAULT
Case No.: C08-1560 MHP

1 I declare under penalty of perjury that I am one of the attorneys for the Plaintiffs in the
2 above entitled action, and that the foregoing is true of my own knowledge.

3 Executed this 16th day of April, 2008, at San Francisco, California.

4 SALTZMAN & JOHNSON
5 LAW CORPORATION

6
7 By: _____/s/_____
8 Shaamini A. Babu
9 Attorneys for Plaintiffs
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

I, the undersigned, declare:

I am a citizen of the United States and am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to this action. My business address is 120 Howard Street, Suite 520, San Francisco, California 94105.

On April 16, 2008, I served the following document(s):

**REQUEST FOR ENTRY OF DEFAULT; AND
DECLARATION OF SHAAMINI A. BABU IN SUPPORT THEREOF**

on the interested parties in said action by placing a true and exact copy of each document in a sealed envelope with postage thereon fully prepaid, in a United States Post Office box in San Francisco, California, addressed as follows:

**Christopher D. Johnson
Authorized Agent for Service of Process
Jolandco, Inc.
9083 Foothills Blvd., Suite 350
Roseville, California 95747**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 16th day of April, 2008, at San Francisco, California.

_____/s/_____
Vanessa de Fábrega